

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	
	:	
v.	:	1:18CR61-1
	:	
TIMOTHY GEORGE DOWD	:	

MOTION TO REVOKE CONDITIONS OF RELEASE

NOW COMES the United States of America, by and through Matthew G.T. Martin, United States Attorney for the Middle District of North Carolina, and respectfully moves the Court, pursuant to Title 18, United States Code, Section 3148(b), for revocation of the conditions of release for the defendant, and for the issuance of an arrest warrant. In support of this motion, the Government states to the Court the following:

1. On March 1, 2018, subsequent to his indictment for violations of Title 18, United States Code, Section 875(c) and Title 18, United States Code, Sections 1001(a)(2), the defendant was released upon his agreement to abide by the conditions of pre-trial release imposed by the court.

2. One of the conditions of the defendant's release was that he not possess or use a computer, or other means, to access the internet or an email account service. (See Attachment #1, Amended Order Setting Conditions of Release, dated March 16, 2018).

3. On April 12, 2018, the undersigned received written notice from Jessica Chavez, United States Probation Officer, that on April 1, 2018 and April 9, 2018, the defendant accessed the internet and sent threatening emails to the U.S. Capitol Police Public Information Office. (See Attachment #2, Memorandum from Jessica Chavez, dated April 12, 2018).

WHEREFORE, the United States respectfully requests the Court to issue a warrant for the arrest of the defendant and set this matter for a hearing at the earliest possible time.

This the 13<sup>th</sup> day of March, 2018.

Respectfully submitted,

MATTHEW G.T. MARTIN  
United States Attorney

/S/ TERRY M. MEINECKE  
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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of April, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Ira R. Knight, Esq.

Respectfully submitted,

/S/ TERRY M. MEINECKE  
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